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July 23, 2012

Captain Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS

Re: Guam and CNMI Divert Activities and Exercises EIS

Dear Captain Heyse:

I write to comment on the Draft Environmental Impact Statement (EIS) for Divert Activities and Exercises in Guam and the Commonwealth of the Northern Mariana Islands issued by Headquarters, Pacific Air Forces, in June 2012. The EIS examines a Proposed Action to improve existing airport and associated infrastructure to increase operational and divert capabilities in support of expanding mission requirements in the Western Pacific region.

I appreciate the efforts to date of the U.S. Air Force and the Department of Defense to explore all aspects of the Proposed Action and to consider all relevant public comments, especially from those who would be most impacted, the people of Tinian and Saipan. Also, I am grateful that both alternatives for the Proposed Action include improvements to existing airports in the Northern Marianas. This investment would be welcome to the islands' ailing economy and would provide much-needed jobs.

Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons:

1. **Noise pollution would be less of a factor on Tinian than on Saipan.** There are multiple residential villages adjacent to the Saipan airport that would be heavily impacted by increased noise levels both from the construction and from the subsequent operational activities related to the Proposed Action. These villages include Koblerville, Afetnas, San Vicente, San Antonio, As Lito, and Dandan, all of which have considerable residential populations, schools, recreational areas, and tourist sites.

Increased noise levels at the Tinian airport, on the other hand, would have

minimal impact on the residents of Tinian. The closest residential development area is over one and a half miles away. There are no schools, recreational areas, or tourist sites in the vicinity of the airport. All of the land north of the airport is currently leased by the U.S. for military use, and recent training exercises held on Tinian have demonstrated that residential areas south of the airport are exposed to very low noise levels from military construction and aircraft operations there.

- 2. The Tinian airport alternative would reduce potential conflicts between commercial and military activities.** The Saipan International Airport is the gateway for the tourist economy of the Northern Marianas. There were in 2011 an average of 140 aircraft operations daily at the Saipan airport, including jet, single-engine, and turbo prop international and inter-island flights. By contrast, there were 113 aircraft operations daily on average at Tinian airport in 2011, but these all involved small, single-engine aircraft and no international flights. So the Tinian Airport has greater capacity for the proposed increased use by the military.

In addition, it has been demonstrated that military use can disrupt the commercial flights at Saipan Airport, which are essential to the overall economy of the islands. On February 21, 2012, an Air Force F-16 Falcon made an emergency landing at Saipan International Airport. This single incident forced the runway to be shut down for 18 hours, causing delays and cancellations of domestic and international flights to the detriment of tourist travel. The Proposed Action estimates eight weeks per year of joint military exercises and divert and humanitarian airlift staging training, so the potential for disruption of commercial activities at the Saipan Airport would be significant. The Tinian alternative would reduce this potential for conflict and avoid detriment to the flight-dependent tourist economy, as well as loss of revenues to the Commonwealth Ports Authority from decreased landing and other fees from an interruption in commercial flights.

- 3. Tinian airport's runway could more easily be expanded to the requisite length.** The Proposed Action would require that the Saipan airport runway be extended from the current 8,700 feet length to 10,075 feet. This would require that additional land be leased from the government of the Northern Mariana Islands at a cost to the Department of Defense. This Saipan extension would also require prior approval by the Federal Aviation Administration for a non-standard runway.

By contrast, expansion of Tinian's airport runway from its current 8,600 feet to a requisite 10,000 feet would not require that additional land be leased from the local government. Rather the additional land needed for the runway extension is in the area already leased and paid for by the U.S.

- 4. Adverse impacts on the endangered nightingale reed-warbler could be expected on Saipan.** Areas surrounding the Saipan airport have been identified as critical habitat for the nightingale reed-warbler, a species listed as endangered under the Endangered Species Act. The three years of construction activities that the Saipan alternative would require, as well as the subsequent implementation of the divert operations and annual eight-week training, are likely to have an adverse impact on that habitat and require mitigation measures.

With the Tinian alternative, no threatened or endangered species are anticipated to be significantly affected in either the construction or the implementation phase. Therefore, no mitigation efforts are likely to be needed on Tinian and these costs can be avoided.

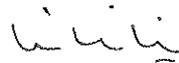
- 5. Development of the Tinian alternative could have synergistic benefit for other military activities on Tinian.** A number of joint, combined, and unit-level military training activities and exercises, described and analyzed in the Mariana Islands Range Complex EIS and subsequent Record of Decision, are scheduled for Tinian. Four live firing ranges are to be constructed there. These activities would benefit from renovation of the Tinian harbor to allow for safe, efficient, and reliable transportation of equipment, fuel, and military personnel. Developing the Tinian alternative for divert activities and exercises would strengthen the rationale for investment in harbor renovation and make Tinian an even more attractive location for joint-service and joint international training exercises.
- 6. Tinian has the necessary lodging options to support temporary personnel.** Billeting for up to 700 personnel is required to support aircraft operations during a divert landing, humanitarian airlift, or military exercise event. The under-utilized Tinian Dynasty Hotel and Casino has 412 rooms capable of housing 824 temporary support personnel. Tinian also has several smaller scale hotels. While there are fewer commercial lodging options in total than on Saipan, there is

sufficient capacity on Tinian; and the cost and concentration of these facilities may make Tinian a preferable alternative from the point of view of billeting.

The people of the Northern Mariana Islands will benefit from and welcome the development of either the Saipan or Tinian alternative for the divert capabilities, humanitarian airlift, and training exercises proposed in the Draft Environmental Impact Statement. For the reasons I have stated, however, the Tinian alternative offers a number of advantages, which I ask be given full consideration in development of the Final EIS and, ultimately, the Record of Decision.

Thank you for your consideration of my comments. Please feel free to contact me with any questions or concerns.

Sincerely,



GREGORIO KILILI CAMACHO SABLAN  
Member of Congress